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Attorneys for Plaintiff

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Rocio Flores

**UNITED STATE DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ANTONIO LOPEZ, individually;
JOHANNA LOPEZ, individually;
M.R., by and through his guardian ad
litem, April Rodriguez, individually
and as successor in interest to
Brandon Lopez; B.L. and J.L., by and
through their guardian ad litem
Rachel Perez, individually and as
successors in interest to Brandon
Lopez; S.L., by and through his
guardian ad litem, Rocio Flores,
individually and as successor in
interest to Brandon Lopez,

Plaintiff,

vs.

Case No.: 8:22-cv-01351-JVS-ADS

*(Honorable James V. Selna; Magistrate
Judge Autumn D. Spaeth)*

**DECLARATION OF LENA P.
ANDREWS IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT, OR
PARTIAL SUMMARY JUDGMENT**

*(Filed concurrently with Plaintiffs'
Opposition to Defendants' Motion for*

CITY OF ANAHEIM, a municipal corporation; CITY OF SANTA ANA, a municipal corporation; DAVID VALENTIN, individually and in his official capacity as the Chief of Police for the CITY OF SANTA ANA Police Department; JORGE CISNEROS, individually and in his official capacity as the Chief of Police for the CITY OF ANAHEIM Police Department; PAUL DELGADO, individually and in his official capacity as an officer for the CITY OF ANAHEIM Police Department; BRETT HEITMAN; KENNETH WEBER, individually and in his official capacity as an officer for the CITY OF ANAHEIM Police Department; BRETT HEITMAN; CAITLIN PANOV, individually and in her official capacity as an officer for the CITY OF ANAHEIM Police Department; BRETT HEITMAN, individually and in his official capacity as an officer for the CITY OF ANAHEIM Police Department; BRETT HEITMAN; DOES 1-10, individually and in their official capacity as law enforcement officers for the CITY OF ANAHEIM Police Department and CITY OF SANTA ANA Police Department,,

Defendants.

Summary Judgment; Plaintiffs' Statement of Additional Material Facts; Plaintiffs' Statement of Genuine Disputes of Material Fact; Plaintiff Statement of Evidentiary Objections)

Date: August 12, 2024

Time: 1:30 p.m.

Crtrm.: 10C

FPTC Date: September 9, 2024

Trial Date: September 17, 2024

I, Lena Andrews, declare:

1. I am an attorney who is licensed to practice law in California and before this Court. I represent the Plaintiffs in the above captioned matter and I have personal knowledge of the following facts, and, if called as a witness, I could and would competently testify thereto.

2. Attached hereto as "Exhibit A" is a true and correct copy of relevant portions of the Anaheim Police Department Computer Aided Dispatch re the Incident.

1 3. Attached hereto as “**Exhibit B**” is a true and correct copy of
2 photographs contained in the Department of Justice Report re the Incident.¹

3 4. Attached hereto as “**Exhibit C**” is a true and correct copy of an
4 Anaheim Police Department Report regarding evidence collected from the car after
5 the incident.

6 5. Attached hereto as “**Exhibit D**” is a true and correct copy of relevant
7 portions of the Deposition of Plaintiff Johanna Lopez.

8 6. Manually filed as “**Exhibit E**” is a true and correct copy of Defendant
9 Panov’s Body Worn Camera.

10 7. Manually filed as “**Exhibit F**” is a true and correct copy of Defendant
11 Delgado’s Body Worn Camera.

12 8. Manually filed as “**Exhibit G**” is a true and correct copy of Defendant
13 Weber’s Body Worn Camera.

14 9. Attached hereto as “**Exhibit H**” are true and correct copies of Still
15 Frames from Defendant Panov’s Body Worn Camera.

16 10. Attached hereto as “**Exhibit I**” are true and correct copies of Still
17 Frames from Defendant Delgado’s Body Worn Camera.

18 11. Attached hereto as “**Exhibit J**” are true and correct copies of Still
19 Frames from Defendant Weber’s Body Worn Camera.

20 12. Attached hereto as “**Exhibit K**” is a true and correct copy of the
21 Autopsy Report of Brandon Lopez.

22 13. Manually filed with Plaintiffs’ Application to File Under Seal as
23 “**Exhibit L**” is a true and correct copy of the Body Worn Camera Footage of Santa
24 Ana Police Department Officer Arias.

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27 ¹ The full report is equally available to all parties online at the California Department of Justice’s website.

1 14. Attached hereto as “**Exhibit M**” is a true and correct copy of a
2 photograph of the bag Brandon Lopez was holding during the Incident contained in
3 the Department of Justice Report re the Incident.²

4
5 I declare under penalty of perjury that the foregoing is true and correct.
6 Executed on July 22, 2024, at Beverly Hills, California.

7
8 By: /s/ Lena Andrews

9 Lena Andrews
10 Attorneys for Plaintiff
11 Antonio Lopez, Johanna Lopez, &
12 S.L. by and through his guardian ad
13 litem Rocio Flores

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27 ² The full report is equally available to all parties online at the California Department of Justice’s website.